

3600 Camelot Drive SE Grand Rapids, MI 49546  
(616) 949-1100 tel  
(616) 949-7865 fax  
[www.disabilityadvocates.us](http://www.disabilityadvocates.us)

**Sept. 13, 2007**

**To: MSHDA**

**Re: Qualified Allocation Plan Draft**

Disability Advocates of Kent County has reviewed the proposed changes to the Draft Qualified Allocation Plan (QAP) and after discussion with a number of non-profit developers, we offer the following comments:

First of all, we commend MSHDA for the language on page 15 A.1 which states that 10% of all units in any given project shall be given leasing priority for Supportive Housing Tenants with rents structured at or below 30% of Average Median Income.

We realize that such a requirement will raise new challenges for development and will require developers to establish new relationships with social service providers over an extended period of time, but we believe that the need for supportive housing is so great that it justifies such a requirement. We suggest that some of the challenges for developers could be alleviated if:

- Vouchers were attached to the supportive housing units
- Services were funded through CMH, HUD or other financial providers
- The tax credit on the 30% units was increased
- Requirements remain flexible for small projects of less than 25 units.

These accommodations may need to be made in order to insure the financial viability of the project.

MSHDA should further be commended for the low income targeting (p19) that requires that 10% of the low income housing tax credit units in a development must have income and rents set at 40% of AMI and 10% of the units at 30% of Average Median Income.

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Again, in order to insure the financial viability of any project we ask that MSHDA consider

- Providing vouchers for these units
- Increasing tax credits on the units
- Providing incentives to insure that the projects continue to serve low-income working families.

Regarding persons with disabilities, we ask that the QAP definition of Special Needs/Supportive Housing specifically set aside units for people with disabilities of all ages who are transitioning from nursing facilities, AFC homes and Homes for the Aged. Due to the decrease in mobility by our aging population and as veterans with disabilities return home, we urge you to raise the requirements for units that will have accessible features. Every unit built should comply with Public Act 182 requiring that each should be constructed according to the Type B (adaptable to usable) dwelling unit requirements of the Michigan Construction Code. This standard will result in a more usable and adaptable housing stock.

Finally, we are very concerned about the geographic targeting outlined in the QAP. In many medium sized municipalities, with suburbs like Wyoming, Michigan, low income housing tax credit projects would be excluded. We believe that projects should not be concentrated in specific areas, but should be integrated throughout the state to facilitate choice for both developers and tenants. We recommend that MSHDA target areas in the broader metropolitan statistical area.

Disability Advocates of Kent County believes that all persons have the right to live independently and we encourage individual choice and responsibility. We should all have the opportunity to share and participate in community activities with dignity and the capacity to contribute to the greater society. Only by enacting these provisions can we hope to achieve a barrier-free society for all.

with Public  
Housing  
Program

Respectfully submitted by:

Frank Lynn, Housing Specialist

Cyndy Viars, Long Term Care Systems Change Facilitator

Sharon Hall, Consumer Advocate

Robyn Saylor, Consumer Advocate

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